Exhibit D

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D | Page 2 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

3200 Southwest Freeway

Houston, TX, 77027

Aaron Webster

Suite 1490

Brussels
Dallas
Dubai
Houston Sa
London

New York Palo Alto Riyadh San Francisco Washington

Due Upon Receipt

Invoice Number:

50007148

088698.0101

Invoice Date:

February 16, 2022

Matter Number:

REMITTANCE STATEMENT

Matter Number:

088698.0101

Client:

Webster, Steven A.

Matter:

OMTC Dispute

Invoice Number:

50007148

Billing Attorney:

M D McElvy

Office:

Houston

Total Fees

\$46,934.00

Less Discount

\$(7,040.10)

Total Expenses

\$59.80

Total Invoice Amount

\$39,953.70

TO ENSURE PROPER APPLICATION OF YOUR PAYMENT PLEASE RETURN THIS REMITTANCE ADVICE OR EMAIL TO ARHOUSTON@BAKERBOTTS.COM

Please Remit to:

Wiring Instructions

Baker Botts L.L.P. Bank: JP Morgan Chase Bank

Address: 712 Main Street, Houston, TX 77002

ABA Number: 021 000 021 Swift Code: CHASUS33 Primary Account: 001 0000 2006 (Reference Invoice Number) ACH Information:

Baker Botts L.L.P. Bank: JP Morgan Chase Bank

Address: 712 Main Street, Houston, TX 77002 Routing Number: 111 000 614

Primary Account: 001 0000 2006 (Reference Invoice Number) To Pay by Check, send to: Baker Botts L.L.P. P.O. Box 301251 Dallas, TX 75303-1251 (Reference Invoice Number)

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 3 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Aaron Webster 3200 Southwest Freeway Suite 1490 Houston, TX 77027 Austin Brussels Dallas Dubai Houston London Moscow New York Palo Alto Riyadh San Francisco Washington

Invoice Number:

50007148

Invoice Date:

February 16, 2022

Attorney:

M D McElvy

Total fees for services and expenses for the matter shown below through January 31, 2022

088698.0101

OMTC Dispute

<u>Date</u> 01/03/22	<u>Name</u> C E Tutunjian	Hours 3.3	<u>Description</u> Continued researching key issues related to Mandarin lawsuit.
01/04/22	K M McElvy	0.9	Reviewed text messages between A. Webster and Mandarin relating to new suit; check in call with
01/04/22	C E Tutunjian	4.6	Discussed case status with M. McElvy; continued researching key issues related to Mandarin lawsuit; researched whether
01/05/22	K M McElvy	0.1	Sent draft proposed findings of fact and conclusions of law in Goldman Sachs garnishment case to C. Tutunjian for review and comment.
01/05/22	C E Tutunjian	0.6	Reviewed draft findings of fact for Goldman Sachs garnishment judgment.
01/06/22	C A Davis	0.6	Researched Utah Secretary of State business entity Mandarin Capital LLC and J. Mayer at the request of C. Tutunjian.
01/06/22	K M McElvy	1.5	Reviewed and revised draft findings of fact and conclusions of law to submit to court in Goldman Sachs garnishment proceeding; call with A. Webster regarding
01/06/22	C E Tutunjian	3.0	Discussed strategy for Mandarin lawsuit with M. McElvy; prepared summary of timeline of events and strategy for Mandarin lawsuit; researched issues related to Mandarin lawsuit.

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BAKER BOTTS LLP

Webster, Steven A. OMTC Dispute

Invoice No:

50007148

Invoice Date:

February 16, 2022

Matter:

088698.0101

<u>Date</u> 01/07/22	Name C E Tutunjian	Hours 0.7	<u>Description</u> Continued preparing summary of timeline of events and strategy for Mandarin lawsuit; continued researching issues related to Mandarin lawsuit.
01/10/22	K M McElvy	0.8	Began drafting summary of litigation for client.
01/10/22	C E Tutunjian	0.9	Prepared answer to Mandarin action.
01/11/22	K M McElvy	0.9	Began drafting comprehensive email to client outlining strategy and options to defend Mandarin Capital lawsuit based on research from C. Tutunjian; brief call with co-counsel regarding finalizing findings of fact and conclusions of law in Goldman Sachs garnishment proceeding.
01/11/22	S D Powers	1.1	Reviewed and analyzed complaint and conference with M. McElvy and C. Tutunjian regarding
01/11/22	C E Tutunjian	0.7	Discussed Mandarin lawsuit strategy and with M. McElvy and S. Powers.
01/12/22	K M McElvy	4.8	Drafted comprehensive email to client providing overview of research and defense strategy issues concerning the Mandarin Capital lawsuit and also providing an update on the status and next steps in the Goldman Sachs garnishment proceeding; conference call with C. Tutunjian to discuss same and also consider involuntary bankruptcy petition against Rogers.
	C E Tutunjian ed line items are time administrative expense	3.4	Revised update to client regarding Mandarin lawsuit strategy; prepared releases of judgment for A. Webster and D. Woods; discussed Mandarin lawsuit strategy with M. McElvy and J. Dunlay.
01/13/22	C E Tutunjian	0.8	Discussed bankruptcy issues with David Eastlake.
01/14/22	K M McElvy	1.2	Call with C. Tutunjian regarding basics of how involuntary bankruptcy process works; follow up call with S. Webster and A. Webster to discuss options for defending Mandarin Capital lawsuit, status of Goldman Sachs garnishment proceeding, and related strategic matters; called and left voicemail with opposing counsel regarding potential dismissal of A. Webster and D. Woods from lawsuit.
01/14/22	C E Tutunjian	0.3	Discussed Mandarin lawsuit strategy and counterclaims with M. McElvy.
01/17/22	K M McElvy	0.5	Finalized and sent draft releases of judgment to D. Woods and A. Webster in preparation for teeing up proposal to dismiss them from case to opposing counsel.

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BAKER BOTTS ILLP

Webster, Steven A. **OMTC** Dispute

50007148 Invoice No:

February 16, 2022 Invoice Date:

088698.0101 Matter:

<u>Date</u>	Name	Hours	Description
01/17/22	C E Tutunjian	0.2	Discussed Mandarin lawsuit strategy with M. McElvy.
01/18/22	D R Eastlake	2.2 IOTE: Time entry	Teleconference and correspondence with M. McElvy and C. Tutunjian regarding involuntary bankruptcy issues/considerations and strategy; draft detailed outline regarding same; analyze involuntary filing issues and considerations in connection with same.
01/18/22	K M McElvy re	educed by 1/2 for 3.2 dministrative xpense claim	Correspondence and call with D. Eastlake and C. Tutunjian regarding options and process for involuntary bankruptcy in light of numerous outstanding creditors against Rogers; reviewed and revised draft objections to findings of fact and conclusions of law in Goldman Sachs garnishment proceeding and discussed same with co-counsel.
01/18/22	C E Tutunjian	2.6	Discussed bankruptcy issues with M. McElvy and D. Eastlake; prepared summary of involuntary bankruptcy proceedings for client.
01/19/22	D R Eastlake	0.2	Reviewed and responded to correspondence from C. Tutunjian regarding priority of domestic support obligation and pending divorce of debtor.
01/19/22	K M McElvy	0.6	Further correspondence with D. Eastlake and C. Tutunjian regarding requirements and options for involuntary bankruptcy; reviewed status of Rogers' divorce proceeding and other pleadings sent by reference librarian.
01/19/22	C D Montalvo	2.6	Researched and obtained list of cases as well as dockets and complaints involving D. Rogers or specific companies for M. McElvy.
01/19/22	C E Tutunjian	0.8	Continued preparing summary of involuntary bankruptcy proceedings for client.
01/24/22	K M McElvy	0.5	Corresponded with C. Tutunjian regarding outstanding research and needs on Mandarin Capital lawsuit in light of plaintiff's response to request to dismiss A. Webster and D. Woods; reached out to Dallas paralegal regarding availability to file releases of judgment.
01/24/22	C E Tutunjian	0.3	Discussed case status with M. McElvy.
01/25/22	C E Tutunjian	0.8	Researched issues related to release of judgment in Mandarin suit.

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Invoice No:

50007148

Invoice Date:

February 16, 2022

Matter:

088698.0101

BAKER BOTTS LLP Webster, Steven A.

OMTC Dispute

<u>Date</u> 01/26/22	Name K M McElvy	Hours 0.1	<u>Description</u> Corresponded with paralegal regarding need to file releases of
			judgment as to A. Webster and D. Woods.
01/27/22	J Aquino	0.2	Requested in person filing of release of judgment with Dallas County real property records.
01/27/22	K M McElvy	3.1	Reviewed case law on discussed issues with strategy in defending the Mandarin Capital lawsuit in light of same; began drafting lengthy email update to client with recommendations on how to proceed as to the Mandarin Capital lawsuit and overview of involuntary bankruptcy process; attention to correspondence regarding filing of releases of judgment as to A. Webster and D. Woods.
01/27/22	C E Tutunjian	0.8	Discussed Mandarin lawsuit strategy and concern regarding potential slander of title claim with M. McElvy.
01/31/22	K M McElvy	0.5	Followed up regarding release of judgment and follow up discussion with C. Tutunjian regarding concern over
Matter Hours	-	49.4	Value of highlighted line-items (with
Matter Fees		\$46,934.00	15% fee discount) = \$8,442.20
		(7,040.10)	
Matter Fees with Discount Total		\$39,893.90	

BAKER BOTTS LLP

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Invoice No: Invoice Date: 50007148

February 16, 2022

Matter:

088698.0101

Webster, Steven A. **OMTC** Dispute

2022 Lawyer Summary

Timekeeper	HOURS	RATE	<u>AMOUNT</u>
D R Eastlake	2.4	1,305.00	3,132.00
K M McElvy	18.7	1,130.00	21,131.00
S D Powers	1.1	1,150.00	1,265.00
C E Tutunjian	23.8	860.00	20,468.00
	46.0		\$45,996.00

2022 Non-Lawyer Summary

Timekeeper		HOURS	RATE	AMOUNT
J Aquino		0.2	370.00	74.00
C A Davis		0.6	270.00	162.00
C D Montalvo		2.6	270.00	702.00
	*	3.4		\$938.00

For Expenses Incurred:

Vendor: American Express Co. Invoice#: 370 Date: 2/10/2022 - AMEX MC Statement Jan 25, 2022 -	
AMERICAN EXPRESS Miscellaneous - Legal CHRISTINE DAVIS Researched Utah SOS Business	
Search at the request of CTutunjian	

Vendor: American Express Co. Invoice#: 4949915901181559 Date: 1/18/2022 - Court fee for recorded copy of document - AMERICAN EXPRESS Court Fees KATHRYN MCELVY Fee for copy of recorded document from Dallas County courthouse

Vendor: Business Card Invoice#: 050030227253 Date: 01/24/2022 - Business Card; Research Fees 48.30 for January 2022

\$59.80 **Total Expenses**

4.00

7.50

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BAKER BOTTS LLP

TAX ID 74-1195457

Houston, TX 77098

Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Webster, Steven A.Invoice Number:50008532AEC PartnersInvoice Date:March 16, 20222701 Kirby DriveAttorney:M D McElvy

Total fees for services and expenses for the matter shown below through February 28, 2022

NOTE: All time entries and disbursements on this invoice relate to administrative expense claim

088698.0102

<u>Date</u>	<u>Name</u>	Hours	Description
02/09/22	D R Eastlake	1.6	Teleconference and correspondence with M. McElvy regarding involuntary filing and related issues/next steps; reviewed and analyzed issues with and requirements for appointment of interim chapter 7 trustee; sent follow up correspondence with M. McElvy and C. Tutunijian regarding findings regarding same; reviewed final agreed judgment in connection with trustee analysis.
02/09/22	K M McElvy	0.7	Corresponded with client to confirm meeting on Friday to discuss involuntary bankruptcy options and strategy; brief call with D. Eastlake to discuss assistance in preparing and litigating involuntary bankruptcy if needed and potential for interim appointment of trustee.
02/10/22	K M McElvy	0.9	Worked with associate to get more updated information on case status of certain of Rogers' creditors in preparation for meeting to discuss involuntary bankruptcy; call with A. Webster regarding scheduling of meeting.
02/10/22	C D Montalvo	1.3	Researched and obtained judgments and dockets in requested cases for Meghan McElvy.
02/10/22	E A Rohles	2.0	Identified case status and disposition of Rogers' creditors.
02/11/22	D R Eastlake	2.4	Teleconference with M. McElvy, A. Webster and S. Webster regarding involuntary filing and related issues and strategic considerations for next steps; prepared for same; teleconference with M. McElvy regarding path forward; reviewed updated creditors list received from M. McElvy and E. Rohles; analyzed various filing issues and implications of divorce proceeding on same.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50008532 Invoice Date: March 16, 2022 Matter: 088698.0102

<u>Date</u>	<u>Name</u>	<u>Hours</u>	Description
02/11/22	K M McElvy	1.3	Prepared for and held conference call with client to discuss involuntary bankruptcy options and strategy; called T. Sales regarding potential assistance on evidentiary hearings for matter.
02/11/22	E A Rohles	0.5	Reviewed judgments filed against D. Rogers to determine which are final and undisputed for purposes of involuntary bankruptcy.
02/16/22	D R Eastlake	0.3	Discussed involuntary filing issues and path forward with M. McElvy.
02/16/22	K M McElvy	1.7	Drafted update to client regarding involuntary bankruptcy fee estimate; reviewed and discussed fee estimate with D. Eastlake; strategized with T. Sales regarding handling of involuntary bankruptcy and collections firm alternatives for client.
02/22/22	D R Eastlake	0.4	Corresponded with M. McElvy regarding involuntary filing and draft petition; review petition form.
02/23/22	J Aquino	0.2	Request certified copies of cases final judgments.
02/23/22	K M McElvy	0.2	Corresponded with paralegal to obtain certified copies of judgments against Rogers in preparation for filing involuntary bankruptcy.
02/25/22	D R Eastlake	2.4	Teleconference and correspondence with M. McElvy and C. Tutunjian regarding involuntary petition/filing and appointment of interim trustee issues; analyzed same; corresponded with R. Fontenla regarding petition and precedent; reviewed precedent; follow up correspondence with C. Tutunjian and R. Fontenla regarding petition and creditors list; reviewed same.
02/25/22	R M Fontenla	3.7	Numerous emails with D. Eastlake, T. Sales, M. McElvy and C. Tutunjian regarding new filing; reviewed dockets in Houston Regional and Black Elk, pulled pleadings and forwarded information to working group; researched Northern District of Texas requirements and begin draft of creditors list.
02/25/22	K M McElvy	1.3	Met with C. Tutunjian to begin drafting petition for involuntary bankruptcy; call with D. Eastlake to discuss questions regarding same; conducted follow up review of sample prior petitions for involuntary bankruptcy with application for appointment of interim Chapter 7 trustee.
02/25/22	C E Tutunjian	0.8	Discussed case strategy with M. McElvy; discussed next steps with M. McElvy and D. Eastlake.

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BAKER BOTTS LLP

Invoice No: 50008532 Invoice Date:

March 16, 2022 Matter: 088698.0102

Webster, Steven A.

<u>Date</u> 02/28/22	Name D R Eastlake	<u>Hours</u> 2.1	<u>Description</u> Multiple correspondence with C. Tutunjian and R. Fontenla regarding involuntary petition preparation, creditor/service list and document production; preliminary review of document production from post-judgment discovery; worked on noticing and service issues and open items; analyzed trustee appointment issues and evidentiary burden.
02/28/22	R M Fontenla	6.2	Downloaded Dropbox document production to iManage Share; emailed with C. Tutunjian regarding original petition; reviewed documents from document production for service list.
02/28/22	C E Tutunjian	2.5	Prepared involuntary bankruptcy petition; researched issues related to appointment of interim trustee.
Matter Hours		32.5	
Matter Fees	\$27	7,671.00	

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 11 of 43

BAKER BOTTS LLP

Invoice No:
Invoice Date:

50008532 March 16, 2022

Matter:

088698.0102

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

2022 Lawyer Summary

<u>Timekeeper</u>	<u>HOURS</u>	RATE	AMOUNT
D R Eastlake	9.2	1,305.00	12,006.00
K M McElvy	6.1	1,130.00	6,893.00
E A Rohles	2.5	580.00	1,450.00
C E Tutunjian	3.3	860.00	2,838.00
	21.1		\$23,187.00

2022 Non-Lawyer Summary

<u>Timekeeper</u>	HOURS	RATE	AMOUNT
J Aquino	0.2	370.00	74.00
R M Fontenla	9.9	410.00	4,059.00
C D Montalvo	1.3	270.00	351.00
	11.4		\$4,484.00

For Expenses Incurred:

Vendor: American Express Co. Invoice#: 5018957603091656 Date: 3/9/2022 - Certified Copies - Dallas	8.00
County District - AMERICAN EXPRESS Court Fees JESSICA AQUINO Certified Copies of Final	
T 1	

Judgments

Vendor: American Express Co. Invoice#: 5018957603091656 Date: 3/9/2022 - Certified Copies - Dallas County District - AMERICAN EXPRESS Court Fees JESSICA AQUINO Certified Copies of Final Judgments - Convenience Fee

0.17

Total Expenses \$8.17

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 12 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Webster, Steven A.

Houston, TX, 77098

AEC Partners 2701 Kirby Drive Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Due Upon Receipt

Invoice Number: Invoice Date:

50008532 March 16, 2022

Matter Number:

088698.0102

REMITTANCE STATEMENT

Matter Number: 088698.0102

Client: Webster, Steven A.

Matter: Dennis J. Rogers, II Bankruptcy Proceeding

Invoice Number: 50008532

Billing Attorney: M D McElvy
Office: Houston

Total Fees \$27,671.00

Total Expenses \$8.17

Total Invoice Amount \$27,679.17

TO ENSURE PROPER APPLICATION OF YOUR PAYMENT PLEASE RETURN THIS REMITTANCE ADVICE OR EMAIL TO ARHOUSTON@BAKERBOTTS.COM

Please Remit to: Wiring Instructions

Baker Botts L.L.P.

Bank: JP Morgan Chase Bank Address: 712 Main Street, Houston, TX 77002

ABA Number: 021 000 021 Swift Code: CHASUS33 Primary Account: 001 0000 2006 (Reference Invoice Number) ACH Information:

Baker Botts L.L.P.

Bank: JP Morgan Chase Bank Address: 712 Main Street, Houston, TX 77002

Routing Number: 111 000 614 Primary Account: 001 0000 2006 (Reference Invoice Number) To Pay by Check, send to: Baker Botts L.L.P. P.O. Box 301251 Dallas, TX 75303-1251 (Reference Invoice Number)

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 13 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Webster, Steven A. AEC Partners 2701 Kirby Drive Houston, TX 77098 Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Invoice Number: 50009722
Invoice Date: April 15, 2022
Attorney: M D McElvy

Total fees for services and expenses for the matter shown below through March 31, 2022

NOTE: Highlighted time entries and disbursements relate to administrative expense claim

088698.0102

Date	<u>Name</u>	Hours	<u>Description</u>
03/01/22	J Aquino	0.4	Followed up on request for certified copies of court papers.
03/01/22	D R Eastlake	3.2	Corresponded with C. Tutunjian and R. Fontenla regarding creditor service list and related issues; reviewed current service list and comment on same; analyzed notice issues; reviewed certain source documents used in compiling service list; reviewed initial involuntary petition and open items/question related to same; reviewed PACER search regarding Webster-related entities; reviewed and responded to detailed correspondence from C. Tutunjian regarding status of legal research and related evidentiary issues and burden pertaining to fraud and appointment of trustee; analyzed same and framework for next steps; corresponded with C. Tutunjian regarding post-judgment document production.
03/01/22	R M Fontenla	4.5	Emailed with C. Tutunjian regarding service list; reviewed documents on iManage Share regarding same; updated service list spreadsheet; emailed with team regarding Pacer search on Dennis J. Rogers II, Bootstrap Ventures, LLC, OMTC, Inc., Nomad Development, LLC, Organ Mountain Energy, LLC, Push Start Industries, LLC, and Montana Amorosa Revocable Trust; performed Pacer searches.
03/01/22	C E Tutunjian	0.8	Prepared involuntary bankruptcy petition; researched issues related to appointment of interim trustee.
03/02/22	E A Rohles	2.5	Researched interim trustees in involuntary chapter 7 cases.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

<u>Date</u>	Name	<u>Hours</u>	<u>Description</u>
03/03/22	D R Eastlake	2.4	Corresponded with Baker Botts team regarding trustee appointment, fraud legal research and related issues; reviewed preliminary research findings prepared by E. Rohles; analyzed same and further research needed; corresponded with Baker Botts team regarding involuntary petition and motion to appoint trustee and open items; conducted preliminary review of draft petition.
03/03/22	R M Fontenla	2.3	Emailed with C. Tutunjian and M. McElvy regarding motion to appoint interim trustee; drafted same.
03/03/22	E A Rohles	4.3	Researched fraud as a basis for appointing a trustee.
03/03/22	C E Tutunjian	5.1	Began drafting application for appointment of interim trustee.
03/04/22	D R Eastlake	3.3	Further reviewed involuntary petition; reviewed and commented on draft motion to appoint an interim trustee; reviewed research regarding same and analyzed; corresponded with Baker Botts team regarding same; corresponded with Baker Botts team regarding creditor list and changes thereto; reviewed revised creditor list.
03/04/22	K M McElvy	1.5	Reviewed draft petition and application for appointment of interim trustee and discussed changes needed to same with C. Tutunjian.
03/04/22	C E Tutunjian	0.2	Discussed status of involuntary bankruptcy issues with M. McElvy.
03/06/22	D R Eastlake	0.2	Reviewed updated creditor list circulated by E. Rohles.
03/06/22	E A Rohles	1.0	Researched judgments against Rogers and updated creditor list with information about final judgments.
03/07/22	D R Eastlake	1.6	Correspondence with M. McElvy regarding involuntary filing and related timing issues; review updated case docket in divorce proceeding; review and comment on draft demand letter; correspondence with Baker Botts team regarding same; review updated demand letter; analyze involuntary filing issues regarding intent.
03/07/22	K M McElvy	4.2	Outlined revised factual background section for application for interim Chapter 7 trustee and discussed same with associates to get them started on drafting; reviewed D. Rogers post-judgment discovery responses to determine net cash and asset position; drafted pre-filing letter to D. Rogers and sent same to D. Eastlake for review; incorporated edits from D. Eastlake to letter.
03/07/22	R E Pravata	0.5	Researched case information for C. Tutunjian.

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BAKER BOTTS LLP

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50009722 April 15, 2022

088698.0102

Invoice Date: Matter: Webster, Steven A.

<u>Date</u>	<u>Name</u>	Hours	<u>Description</u>
03/07/22	E A Rohles	3.0	Researched and drafted summaries of other cases involving Rogers's scams.
03/07/22	C E Tutunjian	2.6	Reviewed D. Eastlake's comments to draft application for interim trustee; continued drafting application for interim trustee.
03/08/22	D R Eastlake	1.8	Teleconferenced and corresponded with M. McElvy regarding demand letter and revisions thereto and motion to appoint interim trustee; reviewed outline of factual background for motion prepared by M. McElvy; reviewed updated creditor list and cash accounts; reviewed revised demand letter; reviewed correspondence from M. McElvy regarding Mandarin lawsuit, motion for summary judgment and timing for filing the involuntary case; corresponded with Baker Botts team, S. Webster and A. Webster regarding involuntary petition, demand letter and status of Mandarin lawsuit and related issues and next steps.
03/08/22	K M McElvy	1.2	Conducted conference call with D. Eastlake regarding draft letter to D. Rogers regarding upcoming filing of involuntary bankruptcy petition; revised same based on discussion and sent same to client along with draft involuntary bankruptcy petition; corresponded with E. Rohles to add information regarding dates of latest lawsuits against D. Rogers to demonstrate ongoing nature of fraud.
03/08/22	C D Montalvo	0.2	Researched and obtained court documents requested by Emily Rohles.
03/08/22	E A Rohles	3.0	Researched and drafted summaries of other cases involving Rogers's scams.
03/08/22	C E Tutunjian	0.3	Continued drafting application for interim trustee.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Date	Name	Hours	Description
03/09/22	D R Eastlake	3.9	Corresponded with M. McElvy regarding Mandarin suit MSJ hearing and scheduling; followed up with M. McElvy regarding additional trustee/fraud research for motion to appoint an interim trustee and preparation of suggestion of bankruptcy; discussed same with K. Jacobsen, including background, status and next steps; reviewed and commented on draft suggestion of bankruptcy; followed up with K. Jacobsen regarding same; teleconferenced and corresponded with C. Tutunjian regarding Mandarin lawsuit and automatic stay issues upon filing of bankruptcy petition; corresponded with C. Tutunjian regarding suggestion of bankruptcy filing requirements in Dallas County district court; reviewed and commented on revised suggestion of bankruptcy; conducted high level review of petition filed in Mandarin lawsuit; corresponded with Baker Botts team regarding status of motion to appoint trustee and timing issues; reviewed and analyzed research findings regarding appointment of trustee and Northern District of Texas involuntary filing requirements and rules; corresponded with M. McElvy and C. Tutunjian regarding same, Beaucrest case and insert for motion; followed up with K. Jacobsen regarding precedent in Madoff involuntary case.
03/09/22	K M Jacobsen	5.8	Researched filing requirements for involuntary petitions in Northern District of Texas and requirements for appointing an interim Chapter 7 trustee.
03/09/22	R E Pravata	1.6	Researched case filings for Emily Rohles.
03/09/22	E A Rohles	6.5	Researched and drafted summaries other cases involving Rogers's scams.
03/09/22	C E Tutunjian	9.1	Continued drafting application for interim Chapter 7 trustee.
03/10/22	C A Davis	0.2	Researched Legislative History on Section 303 of the Bankruptcy Code at the request of K. Jacobsen.
03/10/22	D R Eastlake	2.9	Corresponded with C. Tutunjian and K. Jacobsen regarding legislative history research; analyzed findings regarding same; reviewed Madoff precedent regarding interim trustee appointment in involuntary chapter 7 filing, including various court filings and hearing transcript; followed up with K. Jacobsen regarding fraud/trustee issues and research; detailed correspondence with C. Tutunjian regarding arguments for motion to appoint, including sanction orders and violation of same; reviewed sanction orders entered by state court and Amorosa trust document production; analyzed trustee appointment issues.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

<u>Date</u>	Name	<u>Hours</u>	Description
03/10/22	K M Jacobsen	2.1	Continued research regarding appointing interim Chapter 7 trustee.
03/10/22	E A Rohles	2.0	Drafted summaries of litigation involving Rogers's other scams and compiled relevant petitions and judgments.
03/10/22	C E Tutunjian	5.4	Continued drafting application for appointment of interim Chapter 7 trustee.
03/12/22	K M McElvy	4.3	Reviewed and revised draft emergency motion for appointment of chapter 7 trustee and sent same to client.
03/12/22	E A Rohles	0.2	Researched deadlines for appealing final judgments in Texas state courts.
03/12/22	C E Tutunjian	1.1	Continued drafting application for interim trustee.
03/14/22	D R Eastlake	1.3	Corresponded with Baker Botts team regarding demand letter and exhibits and next steps; teleconferenced with M. McElvy regarding motion to appoint interim chapter 7 trustee and related issues, including evidentiary-wise; reviewed mark-up of motion to appoint trustee received from K. Jacobsen; corresponded with K. Jacobsen regarding Northern District of Texas local rules and filing requirements.
03/14/22	K M Jacobsen	4.2	Revised the motion to appoint interim Chapter 7 trustee.
03/14/22	K M McElvy	1.4	Corresponded with S. Webster to confirm okay to send final demand letter to D. Rogers and sent same with enclosures; call with D. Eastlake to discuss timing of emergency hearing and Dallas bankruptcy judges and asked associate to revise motion to incorporate bankruptcy specific procedures and to prepare motion for emergency hearing.
03/15/22	J Aquino	0.3	Requested certified copies of orders filed in Dallas County District Court.
03/15/22	K M Jacobsen	1.9	Drafted motion for emergency consideration of interim trustee motion.
03/15/22	K M Jacobsen	0.9	Revised motion to appoint interim Chapter 7 trustee.
03/15/22	K M McElvy	0.2	Sent client letter that was sent to D. Rogers regarding imminent filing of involuntary bankruptcy petition against him; began reviewing draft motion to appoint interim trustee.
03/15/22	C D Montalvo	1.6	Researched and obtained Texas and Delaware corporate information of list of companies provided by C. Tutunjian.

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Dennis J. Rogers, II Bankruptcy Proceeding

<u>Date</u>	<u>Name</u>	Hours	<u>Description</u>
03/15/22	C E Tutunjian	1.5	Prepared exhibits for application for interim trustee.
03/16/22	J Aquino	0.3	Contacted records department and coordinated courier pick up of certified copies.
03/16/22	K M McElvy	1.9	Reviewed details of other lawsuits against Rogers and related research for involuntary bankruptcy petition; discussed same with E. Rohles.
03/16/22	C E Tutunjian	0.8	Prepared exhibits for application for interim trustee.
03/17/22	D R Eastlake	0.5	Corresponded with Baker Botts team regarding trustee motion and related issues and next steps; analyzed filing of Rogers' companies along with individual petition.
03/17/22	K M McElvy	7.5	Reviewed and revised draft petition for involuntary bankruptcy against Rogers and circulated edits and comments on same to internal team.
03/17/22	C D Montalvo	0.2	Researched and obtained Texas corporate filings of OMTC Inc. for C. Tutunjian.
03/18/22	D R Eastlake	2.3	Teleconferenced and corresponded with Baker Bots team regarding involuntary filing and related issues, open items and next steps; analyzed individual debtor filing issues; teleconferenced with K. Jacobsen regarding same and follow up legal research; reviewed correspondence from D. Rogers regarding demand letter; conducted follow up teleconference with M. McElvy regarding creditor support for filing; reviewed update email from M. McElvy regarding Mandarin lawsuit and next steps; conducted follow up correspondence with Baker Botts team regarding evidentiary issues and next steps; analyzed same and approach.
03/18/22	K M Jacobsen	4.7	Researched various Chapter 7 issues, including Rogers having primarily business debts, the impact of Rogers' marriage, and whether the trustee can put Rogers' businesses into bankruptcy.
03/18/22	K M Jacobsen	1.6	Revised motion to appoint Chapter 7 interim trustee.
03/18/22	K M McElvy	2.8	Call with Rogers former counsel regarding whether he intended to respond to letter; call with D. Eastlake regarding question of whether Rogers' companies should also be added to petition and whether trustee could access and control his company accounts by virtue of its control over Rogers' individual estate; called potential additional petitioning creditors and lined up same; updated team.

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Webster, Steven A.

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
03/18/22	C D Montalvo	1.5	Researched to obtain financials on Dennis Rogers entities for M. McElvy.
03/18/22	E A Rohles	1.1	Researched the existence of other suits against Rogers for fraud; edit draft of emergency motion to appoint interim chapter 7 trustee; reviewed final judgments and edited creditor list to include language about who the judgments are against.
03/18/22	C E Tutunjian	1.0	Discussed whether Rogers' other business entities should be placed into bankruptcy with M. McElvy; discussed next steps and strategy with M. McElvy and D. Eastlake.
03/19/22	D R Eastlake	4.8	Reviewed and commented on draft motion to appoint interim trustee; corresponded with Baker Botts team regarding same and related issues and open items; reviewed and commented on draft motion to expedite hearing on trustee motion; attended to service issues; corresponded with Baker Botts team regarding same and next steps; reviewed legal research findings regarding various individual involuntary chapter 7 filing issues and analyzed same; conducted follow up correspondence with K. Jacobsen regarding same; reviewed involuntary petition circulated by C. Tutunjian and commented on same; corresponded with Baker Botts team regarding same.
03/19/22	K M Jacobsen	3.1	Continued revising motion to appoint Chapter 7 interim trustee.
03/19/22	K M Jacobsen	2.7	Researched various Chapter 7 issues, including Rogers having primarily business debts, the impact of Rogers' marriage, and whether the trustee can put Rogers' businesses into bankruptcy.
03/19/22	K M Jacobsen	2.3	Revised motion for emergency consideration and reviewed local procedures regarding same.
03/20/22	D R Eastlake	0.6	Reviewed revised motion to appoint trustee; corresponded with K. Jacobsen regarding same.
03/20/22	K M Jacobsen	0.8	Revised motion to appoint interim Chapter 7 trustee.
03/20/22	K M McElvy	0.7	Reviewed research from D. Eastlake on trustee's ability to control Rogers' company accounts through control of Rogers' estate and other issues implicated by Chapter 7 involuntary bankruptcy against individual.
03/20/22	E A Rohles	0.8	Edited draft of emergency motion to appoint interim chapter 7 trustee.

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<u>Date</u>	<u>Name</u>	Hours	Description
03/21/22	D R Eastlake	6.6	Teleconferenced and corresponded with Baker Botts team regarding comments to motion to appoint interim trustee and related issues/open items/next steps; reviewed updated involuntary petition; correspondede with Baker Botts team regarding same; reviewed and commented on revised motion to appoint interim trustee; corresponded with Baker Botts team regarding same; reviewed updated creditor list; attended to exhibits to motion to appoint interim trustee and related issues; corresponded with Baker Botts team regarding same; teleconferenced and corresponded with M. McElvy and D. Miller regarding involuntary filing and related issues and next steps; attended to filing issues; corresponded with R. Fontenla regarding same; reviewed legal research findings/analysis regarding involuntary conversion issues and standards; corresponded with Baker Botts team, S. Webster and A. Webster regarding involuntary filing and status update; reviewed M. McElvy's comments to motion to appoint interim trustee; corresponded with M. McElvy and K. Jacobsen regarding same and open issues/items; reviewed further revised motion to appoint interim trustee.
03/21/22	R M Fontenla	1.0	Emailed with M. McElvy regarding involuntary bankruptcy petition; revised same; emailed with D. Eastlake and M. McElvy regarding electronic signatures; conferenced with Northern District of Texas Clerk regarding same.
03/21/22	K M Jacobsen	0.8	Continued revising motion for emergency consideration of interim trustee motion.
03/21/22	K M Jacobsen	2.1	Continued revising motion to appoint interim Chapter 7 trustee.
03/21/22	K M Jacobsen	4.6	Researched conversion of involuntary Chapter 7 case to Chapter 11.
03/21/22	K M McElvy	4.7	Call with internal team to address various questions on motion to appoint interim trustee from D. Eastlake; call with counsel for other petitioning creditors regarding joining petition and motion to appoint interim trustee; sent updated drafts of petition and motion to appoint interim trustee to client and counsel for other petitioning creditors for review; reviewed and revised updated draft motion to appoint interim trustee and circulated same to team.
03/21/22	E A Rohles	0.8	Reviewed judgments and edited creditor list; collected exhibits for emergency motion to appoint chapter 7 interim trustee.
03/21/22	T J Sales	0.5	Reviewed near final motion to appoint interim trustee and status of filings.

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Webster, Steven A.

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<u>Date</u>	<u>Name</u>	Hours	Description
03/21/22	C E Tutunjian	5.0	Reviewed and provided comments to draft of application for interim trustee; discussed status of petition and application with M. McElvy, D. Eastlake, and K. Jacobsen; prepared exhibits to application for interim trustee.
03/22/22	D R Eastlake	7.2	Worked on finalizing involuntary petition, motion to appoint interim trustee, motion for emergency consideration and suggestion of bankruptcy filings; corresponded and teleconferenced with Baker Botts team regarding same; attended to exhibit issues/open items and redaction issues; corresponded and teleconferenced with Baker Botts team regarding same; corresponded with M. McElvy and D. Rogers regarding involuntary filing and service issues; teleconferenced and corresponded with M. McElvy and D. Miller regarding filing issues; analyzed automatic stay and removal issues pertaining to Mandarin lawsuit; discussed same with M. McElvy; reviewed removal research findings; conducted high level review of draft common interest privilege agreement; attended to filing petition and motions; corresponded and teleconferenced with Baker Botts team regarding same.
03/22/22	R M Fontenla	6.3	Emailed regarding involuntary bankruptcy filing and motion to appoint interim trustee; searched Pacer database for Allison Rogers and forward results to internal team; researched Northern District of Texas filing requirements and emailed regarding same; emailed regarding Index of Exhibits; drafted Index of Exhibits; emailed regarding service list; filed via Electronic Case Filing System involuntary petition; filed via Electronic Case Filing System motion to appoint interim trustee with numerous exhibits; sent numerous emails regarding service documents.
03/22/22	K M Jacobsen	6.7	Finalized motions to appoint interim trustee and motion for emergency consideration thereof; coordinated filing and service of the motions and involuntary petition.
03/22/22	K M Jacobsen	1.8	Researched whether state action could be removed to the bankruptcy court during the gap period.
03/22/22	K M McElvy	5.4	Conferred with Rogers regarding filing of motion to appoint interim trustee; finalized review of petition and motion to appoint interim trustee and related exhibits, index of exhibits and motion for emergency consideration; updated client and co-counsel and obtained authorization to apply e-signatures to same; reviewed and revised service list and coordinated paralegal regarding filing of same.
03/22/22	C D Montalvo	0.7	Researched and obtained state court documents requested by Emily Rohles.

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<u>Date</u> 03/22/22	Name E A Rohles	<u>Hc</u>	3.7	Description Edited draft of emergency motion to appoint interim trustee; edited and prepared exhibits for emergency motion to appoint interim trustee.
03/22/22	C E Tutunjian		8.1	Revised draft of application for interim trustee; prepared exhibits for application for interim trustee; prepared petition and application for interim trustee for filing; prepared service list.
03/23/22	D R Eastlake	Time entry reduced by 1/4 for administrative expense claim	6.7	Corresponded with Baker Botts team regarding issuance of summons and service issues; worked to finalize suggestion of bankruptcy and notice of removal filings; corresponded and teleconferenced with Baker Botts team regarding same and related issues/open items and next steps; attended to service issues, including master service list; corresponded with R. Fontenla regarding same and revisions thereto; analyzed waiver and mandatory abstention issues; finalized certificate of service of yesterday's filings; corresponded with Baker Botts team regarding same; analyzed removal issues - legal and procedural; teleconferenced and corresponded with M. McElvy and T. Sales regarding hearing preparation, evidentiary issues and various other open items/issues; reviewed and commented on draft adversary cover sheet; corresponded with Baker Botts team regarding same; corresponded with court's case manager regarding scheduling issues; discussed same with Baker Botts team; analyzed evidentiary issues and legal strategy for hearing on appointment of a trustee; further reviewed and revised updated adversary cover sheet.
03/23/22	R M Fontenla	Time entry reduced by 1/4 for administrative expense claim	7.1	Sent numerous emails regarding service of filed documents); conferenced with Northern District of Texas Bankruptcy Clerk regarding issuance of summons; emailed with working group regarding same; conferenced with Northern District of Texas Bankruptcy Clerk regarding D. Miller ECF credentials; emailed with working group regarding same; emailed to D. Miller regarding same; conferenced and emailed with CCR regarding service of summons; forwarded documents to CCR for service; worked on service list and emailed regarding same; sent numerous emails and conferences regarding service; emailed with ECF help desk regarding credentials for M. McElvy;; emailed regarding certificate of service; filed same via Electronic Case Filing System with the Northern District of Texas Bankruptcy Court; emailed regarding summons issuance; emailed regarding state court filings; revised exhibits for notice of removal; filed adversary cover sheet and notice of removal via Electronic Case Filing System with the Northern District of Texas Bankruptcy Court; sent numerous emails with N. Zamora regarding state court filings.
03/23/22	K M Jacobsen		1.8	Drafted adversary proceeding cover sheet.

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Date 03/23/22	Name K M Jacobsen		Hours 0.5	Description Drafted certificate of service of interim trustee motions.
03/23/22	K M Jacobsen	ı	4.1	Drafted notice of removal of Mandarin Capital lawsuit.
03/23/22	K M Jacobsen		3.7	Finalized and coordinated filing of various documents related to adversary proceeding and suggestion of bankruptcy.
03/23/22	K M McElvy	Time entry reduced by 1/2 for administrative expense claim	3.5	Finalized and filed petition for involuntary bankruptcy and motion to appoint interim trustee after coordinating with other petitioning creditors' counsel on same; worked with K. Jacobsen and D. Eastlake regarding strategy for filing suggestion of bankruptcy and notice of removal of adversary proceeding as to Mandarin Capital suit; worked with secretary to file same after reviewing and revising.
03/23/22	T J Sales		1.2	Conferenced with D. Eastlake and M. McElvy regarding hearing preparation and strategy and reviewed updated filings.
03/23/22	C E Tutunjian		1.5	Revised and prepared suggestion of bankruptcy and notice of removal for Mandarin action for filing; discussed notice of removal with Meghan McElvy.

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Desc

<u>Date</u> <u>Name</u> <u>Hours</u> <u>Description</u>

03/24/22 D R Eastlake

Attended to summons, scheduling and refiling of documents in bankruptcy and state courts; attended to service issues and direct same; teleconference and correspondence with court case manager regarding scheduling and summons issuance issues; corresponded with Baker Botts team regarding same; reviewed and commented on notice of hearing and certificates of service; teleconferenced with T. Sales and M. McElvy regarding Monday's hearing on emergency motion to appoint trustee and preparations and legal strategy for same; teleconferenced with T. Sales, M. McElvy and D. Miller regarding same and call with UST; began preparing for Monday's contested hearing and formulated legal strategy and approach; office conference with K. Jacobsen regarding same and outlines needed for hearing; reviewed and commented on bankruptcy standards outline prepared by K. Jacobsen; analyzed same; reviewed summons issued by court; reviewed scheduling order; corresponded with R. Fontenla regarding calendaring case dates and deadlines; discussed filing and service issues with K. Jacobsen; reviewed correspondence from process server; corresponded with Baker Botts team regarding various noticing and service issues; reviewed correspondence from D. Miller regarding call with N. Resnick (UST); corresponded with D. Miller and N. Resnick regarding follow up call to discuss case and trustee issues; corresponded with M. McElvy regarding same; corresponded with K. Jacobsen and K. Black regarding hearing and case binders for Monday's hearing; reviewed correspondence from D. Rogers regarding receipt of service and Monday's hearing; sent follow up correspondence to court regarding Rogers' request to continue hearing; corresponded with Baker Botts team regarding Witness and Exhibit list and exhibits and preparation of exhibit binders; analyzed interim trustee appointment standards and issues for oral arguments at Monday's hearing.

03/24/22 R M Fontenla

R M Fontenla
Time entry reduced by
1/4 for administrative
expense claim

Conferenced with Northern District of Texas Clerk regarding issuance of summons; conferenced with Judge Hale's clerk regarding issuance of summons; emailed with working group regarding summons issuance and scheduling order; emailed and conferenced with A. Thompson regarding service of summons and scheduling order on D. Rogers; opened new adversary proceeding; prepared service of adversary proceeding documents on service list; calendared case deadlines, emailed with Judge Hale's clerk regarding same; forwarded numerous exhibits to N. Zamora; filed notice of hearing via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court; worked on service of same; emailed with Judge Hale's court regarding preferences for exhibits for hearing; filed return of summons via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court, conferenced with ECF Help Desk regarding issues regarding same; filed adversary certificate of service via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court; drafted and revised Witness and Exhibit List.

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	Description
03/24/22	K M Jacobsen	1.0	Coordinated filing of separate adversary proceeding and service regarding same.
03/24/22	K M Jacobsen	2.6	Drafted hearing arguments and outline for hearing on motion to appoint interim trustee.
03/24/22	K M Jacobsen	2.2	Drafted notice of hearing on interim trustee motion and coordinated service of same and other documents.
03/24/22	K M McElvy	3.2	Worked with secretary to get copies of filings in preparation for hearing; began outlining plan for emergency hearing on motion to appoint trustee and conferenced with D. Eastlake and T. Sales regarding same; call with co-counsel and client regarding planning for hearing.
03/24/22	T J Sales	2.0	Conferenced with D. Eastlake and M. McElvy regarding preparation for evidentiary hearing on motion to appoint interim trustee; telephone conference with co-defendants counsel; reviewed materials for hearing.
03/24/22	C E Tutunjian	2.7	Analyzed admissibility of exhibits to trustee application for use in hearing; prepared chart analyzing exhibits' admissibility at hearing.
03/25/22	M C Acciarri	6.0	Downloaded and began placing exhibit stickers on exhibits; loaded exhibits into system for use at hearing.

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
03/25/22	D R Eastlake	5.8	Reviewed and commented on revised outline of legal points for Monday's hearing; worked on Witness and Exhibit list, exhibits and related issues/open items; corresponded and teleconferenced with Baker Botts team regarding same; prepared for Monday's hearing on motion to appoint interim trustee; teleconferenced and corresponded with M. McElvy, D. Miller and N. Resnick (UST) regarding involuntary case and trustee motion issues; corresponded with Baker Botts team and D. Miller regarding exhibits; corresponded with court regarding status conference in adversary proceeding and notice issues; reviewed and revised draft notice of hearing; reviewed and commented on revised legal points outline; discussed same with K. Jacobsen; teleconferenced and corresponded with M. McElvy regarding Monday's hearing and recent discussion with D. Rogers regarding same; corresponded with M. McElvy and T. Sales regarding Monday's hearing, preparations therefor and legal strategy; teleconferenced and corresponded with M. McElvy and D. Rogers regarding trustee appointment questions/issues; reviewed legal research regarding dismissal issues; reviewed and commented on agreed order on motion to appoint trustee; reviewed correspondence from J. Kluewer regarding ACMC creditor/judgment and interest in case; reviewed outline of D. Rogers cross-examination.
03/25/22	R M Fontenla	14.5	Revised Witness and Exhibit List; reviewed rules regarding exhibits at hearings and forwarded information to working group; emailed with Judge Hale's clerk regarding same; numerous conferences and emails with C. Acciarri regarding assistance with hearing and exhibit stamping exhibits; emailed with D. Eastlake regarding adversary notice of hearing; drafted and revised same; worked on preparing hearing notebooks; filed same via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court; worked on service of same; broke up D. Miller hearing exhibits and arranged for electronic stickers for same; emailed with C. Tutunjian regarding deposition designations; drafted same.
03/25/22	K M Jacobsen	6.8	Drafted legal outlines for hearing on motion to appoint interim trustee.
03/25/22	K M Jacobsen	0.5	Drafted notice of non-opposition to motion to appoint interim trustee.
03/25/22	K M Jacobsen	1.0	Prepared legal research binder for hearing on motion to appoint interim trustee.
03/25/22	K M Jacobsen	1.2	Researched settlement agreement in involuntary chapter 7 case and drafted agreed order on motion to appoint interim trustee.

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<u>Date</u>	Name	Hours	Description
03/25/22	K M McElvy	8.4	Continued researching, drafting and reviewing materials in preparation for emergency hearing on motion to appoint interim trustee; conducted various calls with D. Rogers and internal team conferring on same.
03/25/22	T J Sales	3.3	Reviewed exhibits, prior depositions and materials in preparation for evidentiary hearing on motion to appoint interim trustee and conference with M. McElvy and D. Eastlake regarding same.
03/25/22	K M Sherman	0.8	Exchanged various correspondence with D. Eastlake and K. Jacobsen regarding status of motion to appoint interim chapter 7 trustee; analyzed cases and statutes cited in motion to appoint trustee and prepared for attorney review.
03/25/22	C E Tutunjian	7.3	Prepared for hearing on application for interim trustee; prepared exhibits and exhibit list for hearing; prepared deposition designations for hearing.
03/26/22	M C Acciarri	2.0	Added exhibit stickers to all exhibits for hearing on motion to appoint interim Chapter 7 trustee.
03/26/22	D R Eastlake	4.9	Continued preparing for Monday's hearing; teleconferenced and corresponded with M. McElvy and D. Rogers regarding same and terms of agreed order to appoint trustee; worked on exhibits; corresponded and teleconferenced with R. Fontenla regarding same and service issues; reviewed and approved Witness and Exhibit list for filing; negotiated agreed order with D. Rogers; teleconferenced and corresponded with D. Rogers regarding same; teleconferenced and corresponded with Baker Botts team regarding same and related issues/next steps; revised agreed order; corresponded with R. Fontenla regarding same and uploaded to court; corresponded with court regarding uploading of agreed order; reviewed and revised opening statement outline; corresponded with K. Jacobsen regarding legal research regarding Chapter 7 living expenses and attorney compensation in connection with negotiating agreed order; reviewed and analyzed legal research findings regarding same; corresponded with J. Prince, K. Chiu and M. McElvy regarding Chapter 7 panel; corresponded with K. Jacobsen regarding edits to legal argument outline; corresponded with D. Miller regarding agreed order on motion to appoint trustee.
03/26/22	R M Fontenla	7.6	Prepared hearing notebooks; emailed regarding Witness and Exhibit List; filed same with numerous exhibits via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court; arranged service by hand on D. Rogers; emailed with D. Eastlake regarding agreed order; uploaded same via Electronic Case Filing System for the Northern District of Texas Bankruptcy Court.

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Date	Name	Hours	<u>Description</u>
03/26/22	K M Jacobsen	2.1	Drafted opening statement for hearing on motion to appoint interim trustee.
03/26/22	K M Jacobsen	0.5	Researched payment of debtor's attorneys fees in chapter 7 involuntary cases.
03/26/22	K M McElvy	3.4	Continued preparing for hearing by reviewing D. Rogers and R. McDonnell deposition designations; call and correspondence with D. Rogers and internal team to reach agreement on order to appoint interim Chapter 7 trustee.
03/26/22	T J Sales	1.0	Conferenced with M. McElvy and D. Eastlake and review of proposed agreed order appointing interim trustee.
03/26/22	C E Tutunjian	3.8	Continued preparing chart analyzing exhibits' admissibility at hearing.
03/27/22	D R Eastlake	2.3	Prepared for tomorrow's hearing; revised hearing outlines; corresponded with K. Jacobsen and R. Fontenla regarding needed hearing documents.
03/27/22	R M Fontenla	1.4	Emailed with D. Eastlake regarding documents needed for Monday hearing; emailed with C. Acciarri regarding hearing; monitoring email for hearing instructions.
03/27/22	K M Jacobsen	0.2	Redlined proper order to agreed order on motion to appoint interim trustee.
03/27/22	K M Jacobsen	0.8	Updated legal outline for hearing on motion to appoint interim trustee.
03/27/22	K M McElvy	1.2	Drafted outline for S. Webster examination if needed and sent same to client with referenced exhibits.
03/28/22	M C Acciarri	0.2	Briefly attended hearing on motion to appoint interim trustee.
03/28/22	D R Eastlake	4.6	Attended court hearing on motion to appoint trustee; prepared for same; revised agreed order per court's instructions; corresponded with R. Fontenla regarding upload of same; corresponded with court regarding same; teleconferenced and corresponded with K. Sadler regarding chapter 7 trustee candidates; teleconferenced and corresponded with O. Alaniz regarding same; discussed same with M. McElvy; teleconferenced and corresponded with M. McElvy and A. Bublick (UST's office) regarding same and appointment process; reviewed entered order on motion to appoint; traveled from Dallas to Houston after hearing.

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<u>Date</u>	<u>Name</u>	<u>Hours</u>	Description
03/28/22	R M Fontenla	4.4	Exchanged numerous emails and conferences with D. Eastlake, M. McElvy, Judge Hale's clerk and C. Acciarri regarding hearing; prepared for hearing; uploaded revised order.
03/28/22	K M McElvy	3.3	Traveled to Dallas and attended involuntary bankruptcy hearing; conducted follow up calls and sent correspondence after hearing with U.S. trustee's office to gauge who would be appointed as trustee and to suggest that it be someone with strong forensic accounting skills.
03/28/22	T J Sales	0.2	Conferenced with D. Eastlake and M. McElvy regarding order on motion to appoint interim trustee.
03/28/22	C E Tutunjian	0.4	Discussed hearing preparation with M. McElvy
03/29/22	D R Eastlake	4.4	Discussed responses to creditor inquiries with M. McElvy; reviewed notice of meeting of creditors; corresponded with M. McElvy regarding same; attended to interim trustee appointment issues; teleconferenced and corresponded with A. Bublick (UST) regarding same and case issues and settings; discussed same with Baker Botts team; reviewed docket, including appointment of trustee and appearances filed by other parties; teleconferenced and corresponded with T. Carroll (counsel for litigation creditor) regarding case status and related issues; corresponded with M. McElvy and T. Sales regarding same; analyzed settlement/dismissal issues and procedures; corresponded with M. McElvy, S. Webster and A. Webster regarding update, interim trustee, open items/issues and next steps; corresponded with R. Fontenla regarding service list update; corresponded with M. McElvy regarding service and noticing issues.
03/29/22	R M Fontenla	1.7	Emailed regarding hearing; calendared hearing and forwarded calendar notices to working group; emailed with D. Eastlake regarding bankruptcy docket, obtained and forwarded same to D. Eastlake;; emailed with D. Eastlake and K. Jacobsen regarding revisions to service lists; revised service lists.
03/29/22	K M McElvy	1.7	Updated client on results of bankruptcy hearing, latest communications with D. Rogers and on appointment of interim trustee; conferenced internally with D. Eastlake regarding same; conferenced with U.S. Trustee's office regarding appointment of interim trustee and next steps.
03/29/22	T J Sales	0.5	Conferenced with M. McElvy regarding order and appointment of interim trustee and strategy on next steps.
03/29/22	C E Tutunjian	3.1	Researched rules for amending pleadings after removing case to federal court; began drafting second amended answer and counterclaim for Mandarin Capital adversary proceeding.

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Webster, Steven A.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
03/30/22	D R Eastlake	2.4	Corresponded with A. Holder regarding involuntary case and related issues; teleconferenced with A. Holder, M. McElvy and D. Miller regarding same and factual allegations, fraud and known assets; teleconferenced and corresponded with A. Bublick regarding fraud allegations and pending litigation against Rogers; corresponded with Baker Botts team regarding appointment of interim trustee and decision of UST; corresponded with M. McElvy and D. Miller regarding trustee selection; teleconferenced with M. McElvy regarding open items issues and next steps in case; corresponded with M. McElvy and D. Miller regarding new creditor inquiry and service/notice issues.
03/30/22	R M Fontenla	0.9	Emailed with M. McElvy and D. Eastlake regarding docket documentation that Areya was appointed interim trustee; reviewed docket and pulled documents regarding same; emailed with Houston mail room regarding package from Continental Court Reporters; emailed with B. Garza and D. Eastlake regarding invoice from Continental Court Reporters regarding summons service.
03/30/22	K M McElvy	2.1	Call with interim trustee and trial attorney in trustee's office to discuss factual background of case; calls with a couple creditors that received notice of the lawsuit; followed up with D. Eastlake regarding same.
03/30/22	C E Tutunjian	2.5	Continued drafting second amended answer and counterclaim for Mandarin Capital adversary proceeding; researched claims available under Texas Uniform Fraudulent Transfers Act.
03/31/22	D R Eastlake	0.9	Attended to service and noticing issues; corresponded with A. Holder, M. McElvy and D. Miller regarding follow up information regarding case/background; teleconferenced with M. McElvy and J. Kluewer regarding case issues and next steps.
03/31/22	R M Fontenla	0.8	Emailed with M. McElvy, D. Miller and D. Eastlake regarding revisions to service lists; revised service lists; emailed with B. Garza regarding Continental Court Reporting invoice.
03/31/22	K M McElvy	0.6	Call with counsel for ACMC creditor regarding involuntary bankruptcy action and strategy considerations for same.
Matter Hours		395.8	
Matter Fees		\$353,399.50	Value of highlighted line-items = \$249,342.09

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BAKER BOTTS ILLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50009722 April 15, 2022 Invoice Date: 088698.0102 Matter:

2022 Lawyer Summary

<u>Timekeeper</u>	HOURS	RATE	AMOUNT
D R Eastlake	80.5	1,305.00	105,052.50
K M Jacobsen	75.1	860.00	64,586.00
K M McElvy	63.2	1,130.00	71,416.00
E A Rohles	28.9	580.00	16,762.00
T J Sales	8.7	1,350.00	11,745.00
C E Tutunjian	62.3	860.00	53,578.00
	318.7		\$323,139.50

2022 Non-Lawyer Summary

<u>Timekeeper</u>	HOURS	RATE	AMOUNT
M C Acciarri	8.2	365.00	2,993.00
J Aquino	1.0	370.00	370.00
C A Davis	0.2	270.00	54.00
R M Fontenla	60.6	410.00	24,846.00
C D Montalvo	4.2	270.00	1,134.00
R E Pravata	2.1	270.00	567.00
K M Sherman	0.8	370.00	296.00
	77.1		\$30,260.00

For Expenses Incurred :	
Vendor: American Express Co. Invoice#: 0100506941431 Date: 4/7/2010050694143122 - AMEX	1.35
charges through March 25, 2010050694143122 - AMERICAN EXPRESS Miscellaneous - Legal	
RICHARD PRAVATA Court filings requested by Emily Rohles	
Vendor: American Express Co. Invoice#: 0100506941431 Date: 4/7/2010050694143122 - AMEX	1.35
charges through March 25, 2010050694143122 - AMERICAN EXPRESS Miscellaneous - Legal	
RICHARD PRAVATA Court filings requested by Emily Rohles	
Vendor: American Express Co. Invoice#: 0100506941431 Date: 4/7/2010050694143122 - AMEX	3.45
charges through March 25, 2010050694143122 - AMERICAN EXPRESS Miscellaneous - Legal	3.43
RICHARD PRAVATA Court filings requested by Emily Rohles	
Vendor: American Express Co. Invoice#: 5043714003281437 Date: 3/28/2022 - 2022.03.15 FedEx	46.13
Package to Dennis Rogers - AMERICAN EXPRESS Miscellaneous - Other KATHRYN MCELVY	
Overnight FedEx fee to Dennis Rogers, II on 3/14/22	
Vendor: American Express Co. Invoice#: 5062945803311550 Date: 3/31/2022 - Certified Copies -	0.15
Dallas County Records - AMERICAN EXPRESS Court Fees JESSICA AQUINO Certified Records of	

Court Documents - Dallas County District Court Records Department

BAKER BOTTS LLP

Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Exhibit D Page 32 of 43 Invoice No: 50009722 April 15, 2022 Invoice Date:

Matter:

088698.0102

Webster, Steven A.

Vendor: American Express Co. Invoice#: 5062945803311550 Date: 3/31/2022 - Certified Copies - Dallas County Records - AMERICAN EXPRESS Court Fees JESSICA AQUINO Certified Records of Court Documents - Dallas County District Court Records Department	7.00
Vendor: American Express Co. Invoice#: 5072420704061520 Date: 4/6/2022 - Court Filing Fee - Webster/Rogers Case - AMERICAN EXPRESS Filing RORY FONTENLA Filing fee for Involuntary Bankruptcy Filing in the Webster/Rogers case (088698.0102)	338.00
Vendor: American Express Co. Invoice#: 5074992504131345 Date: 4/13/2022 - Hearing expenses for 088698.0102 - AMERICAN EXPRESS Court Fees RORY FONTENLA Filing fee for Adversary filing	350.00
Vendor: American Express Co. Invoice#: 5074992504131345 Date: 4/13/2022 - Hearing expenses for 088698.0102 - AMERICAN EXPRESS Miscellaneous - Legal RORY FONTENLA Water for bankruptcy hearing on 3/28/2022	6.98
Vendor: American Express Co. Invoice#: 5072144604041700 Date: 4/4/2022 - 2022.03.28 Expenses re Bankruptcy Hearing - AMERICAN EXPRESS Airfare KATHRYN MCELVY 2022.03.28 Roundtrip airfare from Houston to Dallas	495.97
Vendor: American Express Co. Invoice#: 5072144604041700 Date: 4/4/2022 - 2022.03.28 Expenses re Bankruptcy Hearing - AMERICAN EXPRESS Airfare KATHRYN MCELVY 2022.03.28 Upgrade fees	40.00
Vendor: American Express Co. Invoice#: 5072144604041700 Date: 4/4/2022 - 2022.03.28 Expenses re Bankruptcy Hearing - AMERICAN EXPRESS Parking KATHRYN MCELVY 2022.03.28 Airport parking fee.	28.00
Vendor: Mcelvy, Kathryn Meghan D. Invoice#: 5072144604041704 Date: 4/4/2022 - 2022.03.28 Expenses re Bankruptcy Hearing - 2022.03.28 Expenses re Bankruptcy Hearing Taxi / Car Service KATHRYN MCELVY 2022.03.28 Uber ride from Dallas airport to Baker Botts Dallas office.	36.46
Vendor: Mcelvy, Kathryn Meghan D. Invoice#: 5072144604041704 Date: 4/4/2022 - 2022.03.28 Expenses re Bankruptcy Hearing - 2022.03.28 Expenses re Bankruptcy Hearing Taxi / Car Service KATHRYN MCELVY 2022.03.28 Uber ride from Baker Botts Dallas office to Dallas airport.	37.95
Vendor: American Express Co. Invoice#: 5074992504131345 Date: 4/13/2022 - Hearing expenses for 088698.0102 - AMERICAN EXPRESS Lunch RORY FONTENLA Working lunch with D. Eastlake, M. McElvy and R. Fontenla	53.27
Vendor: Continental Ct. Reporters, Inc Invoice#: 319586 Date: 03/29/2022 - Continental Ct. Reporters, Inc; Service of Summons to David James Rogers II	426.50
Vendor: Courthouse News Service, Inc. Invoice#: 716554 Date: 04/01/2022 Courthouse News Service, Inc.; CNS usage for court filings for E.Rohles.	5.00
Delivery services/messengers	25.57
Copies/Blowbacks/Printing-B&W (Internal)	0.00
Copies/Blowbacks/Printing-Color (Internal)	1,879.35

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 33 of 43

BAKER BOTTS LLP

Invoice No: 50009722 Invoice Date: April 15, 2

Matter:

te: April 15, 2022 088698.0102

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Delivery services/messengers 79.20

Total Expenses \$3,861.68

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 34 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Webster, Steven A. Due Upon Receipt

AEC Partners 2701 Kirby Drive Houston, TX 77098

Invoice Number: 50009722
Invoice Date: April 15, 2022
Matter Number: 088698.0102

REMITTANCE STATEMENT

Matter Number: 088698.0102

Client: Webster, Steven A.

Matter: Dennis J. Rogers, II Bankruptcy Proceeding

Invoice Number:50009722Billing Attorney:M D McElvyOffice:Houston

Total Fees \$353,399.50

Total Expenses \$3,861.68

Total Invoice Amount \$357,261.18

TO ENSURE PROPER APPLICATION OF YOUR PAYMENT PLEASE RETURN THIS REMITTANCE ADVICE OR EMAIL TO ARHOUSTON@BAKERBOTTS.COM

Please Remit to: Wiring Instructions

Baker Botts L.L.P.

Bank: JP Morgan Chase Bank Address: 712 Main Street, Houston, TX 77002

ABA Number: 021 000 021 Swift Code: CHASUS33 Primary Account: 001 0000 2006 (Reference Invoice Number) **ACH Information:** Baker Botts L.L.P.

Baker Botts L.L.P.
Bank: JP Morgan Chase Bank

Address: 712 Main Street, Houston, TX 77002
Routing Number: 111 000 614

Routing Number: 111 000 614 Primary Account: 001 0000 2006 (Reference Invoice Number) To Pay by Check, send to: Baker Botts L.L.P. P.O. Box 301251 Dallas, TX 75303-1251 (Reference Invoice Number)

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 35 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Webster, Steven A.

2701 Kirby Dr

Invoice Number: 50011088

Invoice Date: May 13, 2022

Houston, TX 77098

Attorney: M D McElvy

Total fees for services and expenses for the matter shown below through April 30, 2022

NOTE: Highlighted time entries and disbursements relate to administrative expense claim

088698.0102

Date	<u>Name</u>	Hours	Description
04/01/22	R M Fontenla	0.2	Emails with C. Acciarri regarding preparation for hearing on motion to appoint interim trustee.
04/05/22	T J Sales	0.3	Conferenced with team regarding bankruptcy judge and call with Rogers.
04/06/22	D R Eastlake	1.1	Teleconference and correspondence with D. Miller regarding meetings with chapter 7 trustee; teleconference and correspondence with O. Alaniz regarding trustee representation and case funding issues; corresponded with M. McElvy regarding same and next steps; reviewed precedent for case funding, first out claim received from O. Alaniz.
04/07/22	D R Eastlake	0.4	Teleconferenced with M. McElvy regarding case funding and setoff/preference issues and potential recoveries for creditors; follow up correspondence with O. Alaniz regarding case funding issues.
04/07/22	K M McElvy	0.8	Corresponded with D. Eastlake regarding upcoming call with Rogers and interim trustee and issues around Goldman Sachs' foreclosure on its line of credit to Rogers and whether it may be deemed a preferential transfer.
04/07/22	C E Tutunjian	1.7	Prepared outline of options for adversary proceeding with Mandarin Capital; discussed same with M. McElvy.
04/08/22	D R Eastlake	0.9	Teleconferenced with M. McElvy, T. Sales and D. Rogers regarding settlement and involuntary filing issues; teleconferenced with M. McElvy and T. Sales regarding next steps; corresponded with M. McElvy, D. Miller and A. Holder regarding status and update call next week.
			Page 1

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50011088
Invoice Date: May 13, 2022
Matter: 088698.0102

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
04/08/22	K M McElvy	0.5	Call with D. Rogers regarding whether he opposes the involuntary bankruptcy.
04/11/22	R M Fontenla	0.5	Emailed with D. Eastlake regarding hearing deadline; calendared deadlines and forwarded calendar notices to working group.
04/12/22	D R Eastlake	1.9	Teleconferenced with M. McElvy, A. Holder (trustee), and D. Miller regarding involuntary case, settlement and claw back issues; follow up teleconference with M. McElvy regarding same and next steps; reviewed correspondence from D. Rogers regarding settlement discussions; corresponded with T. Sales and M. McElvy regarding same; reviewed follow up correspondence from M. McElvy regarding settlement issues and next steps.
04/12/22	K M McElvy	1.7	Prepared for and participated in call with interim trustee regarding potential settlement with Rogers and path to order for relief on involuntary bankruptcy; discussed Goldman Sachs line of credit and shared underlying documents with trustee.
04/12/22	T J Sales	0.3	Reviewed email correspondence from Rogers and conferenced with M. McElvy and D. Eastlake regarding proposal.
04/13/22	K M McElvy	0.4	Call with D. Rogers regarding potential for settlement of bankruptcy and whether he opposes bankruptcy.
04/14/22	D R Eastlake	0.4	Corresponded with K. Jacobsen regarding preparation of joint pre-conference statement and service/compliance issues; reviewed scheduling order in connection with same.
04/14/22	K M McElvy	0.4	Corresponded with client regarding D. Rogers request for response on settlement.
04/15/22	D R Eastlake	0.4	Review and respond to correspondence from M. Dortch regarding involuntary filing; correspondence with M. McElvy regarding same.
04/15/22	K M McElvy	0.1	Called Steel Corporation regarding prior Rogers lawsuit and proceeding; emailed D. Eastlake regarding questions on Wildcat Lending and Rogers mortgage.
04/17/22	K M Jacobsen	5.6	Researched and drafted joint pre-conference statement.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50011088 May 13, 2022 Invoice Date: Matter: 088698.0102

<u>Date</u>	<u>Name</u>	<u>Hours</u>	Description
04/18/22	D R Eastlake	2.1	Corresponded with M. McElvy and D. Rogers regarding settlement discussions and related issues and next steps; preliminary review of draft joint pre-conference statement; corresponded with Baker Botts team regarding same; analyzed applicable provisions of the Bankruptcy Code and Rules requiring entry of an order for relief when a debtor fails to timely contest or otherwise respond to an involuntary petition; multiple emails with Baker Botts team regarding same, related issues and next steps; reviewed and responded to correspondence from M. Dortch regarding involuntary case.
04/18/22	K M McElvy	0.2	Corresponded with D. Rogers regarding potential settlement; reviewed update from D. Rogers regarding lack of Rogers' objection to involuntary bankruptcy.
04/18/22	T J Sales	0.2	Reviewed update on next steps on order for involuntary bankruptcy.
04/19/22	D R Eastlake	2.8	Teleconferenced and corresponded with M. McElvy regarding status and next steps, including motion for entry of an order for relief; teleconferenced and corresponded with K. Jacobsen regarding same and motions/issues regarding entry of order for relief; reviewed and commented on motion for entry of order for relief on involuntary petition, proposed order on same and motion to expedite hearing; corresponded and teleconferenced with K. Jacobsen regarding same and next steps; corresponded with D. Miller regarding draft motions and next steps; further reviewed and revised draft filings.
04/19/22	K M Jacobsen	2.2	Drafted motion for emergency consideration of motion for entry of involuntary order for relief.
04/19/22	K M Jacobsen	5.7	Drafted motion for entry of involuntary order for relief.
04/19/22	K M Jacobsen	2.5	Drafted proposed order for involuntary relief.
04/20/22	D R Eastlake	1.9	Reviewed comments to draft pre-conference statement received from M. McElvy; corresponded with K. Jacobsen regarding same and other updates/edits to statement; finalized motions regarding entry of order for relief; corresponded with Baker Botts team regarding same; corresponded with D. Miller regarding same; corresponded with A. Holder (trustee) and K. Hill regarding same; corresponded with court case manager regarding filing of motions and requested relief; corresponded with D. Rogers regarding filed motions.
04/20/22	K M Jacobsen	0.8	Finalized and filed motion for entry of involuntary order for relief and motion for emergency consideration thereof.

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BAKER BOTTS LLP

Webster, Steven A.

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice No: 50011088 May 13, 2022 Invoice Date: Matter: 088698.0102

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
04/20/22	K M McElvy	0.3	Reviewed and provided edits to the draft joint pre-conference statement.
04/21/22	D R Eastlake	2.4	Reviewed revised joint pre-conference statement and corresponded with K. Jacobsen regarding same; multiple emails with court regarding hearing on emergency motion and notice of hearing; corresponded with Baker Botts team regarding same; reviewed and commented on notice of hearing; corresponded and teleconferenced with K. Jacobsen regarding same and joint pre-conference statement; reviewed and responded to correspondence from D. Miller regarding next week's hearing; reviewed and responded to correspondence from H. Hanson regarding motion to remand by Mandarin Capital and corresponded with Baker Botts team regarding same; conducted preliminary review of motion to remand and appendix; corresponded with D. Rogers regarding hearing on emergency motion for entry of order for relief.
04/21/22	K M Jacobsen	0.8	Drafted notice of hearing on entry of involuntary order for relief.
04/21/22	K M Sherman	0.5	Exchanged various correspondence with K. Jacobsen regarding status of motion for relief; finalized notice of hearing and prepared for issuance with Northern District of Texas Bankruptcy Court; prepared for service on D. Rogers.
04/22/22	K M Sherman	0.4	Prepared correspondence to K. Jacobsen regarding status of service of notice of hearing for D. Rogers; reviewed and analyzed Mandarin Capital's motion for remand and prepared correspondence to team regarding same; updated associated deadlines for motion to remand.
04/24/22	D R Eastlake	2.1	Prepared for tomorrow's hearing on emergency motion for entry of an order for relief in an involuntary case, including drafting hearing outline and gathering and reviewing exhibits; corresponded with Baker Botts team regarding same.
04/25/22	D R Eastlake	4.1	Attended court hearing on motion for entry of order for relief; finished preparing for same; teleconferenced with D. Miller regarding same; sent post-hearing correspondence with M. McElvy and D. Miller regarding hearing and next steps; corresponded with K. Jacobsen regarding revised order for submission to court; reviewed and commented on same; corresponded with court case manager regarding same; teleconferenced with K. Hill (trustee counsel) regarding Goldman garnishment and related issues; corresponded with K. Jacobsen regarding motion to remand or abstain and research/analysis for response thereto.
04/25/22	K M Jacobsen	0.7	Revised proposed order for involuntary relief.

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BAKER BOTTS LLP

Invoice No: 50011088 May 13, 2022 Invoice Date: Matter: 088698.0102

Webster, Steven A.

<u>Date</u>	<u>Name</u>	<u>H</u>	<u>ours</u>	Description
04/25/22	K M Sherman		0.4	Revised and finalized proposed order for relief; prepared for issuance and service with Northern District of Texas Bankruptcy Court; exchanged correspondence with D. Eastlake and K. Jacobsen regarding same.
04/26/22	D R Eastlake	Time entry reduced by 1/2 for administrative expense claim	3.1	Reviewed correspondence from court case manager regarding order for relief; reviewed order for relief, as entered by the court today, and other filings on the docket today; detailed correspondence with S. Webster, A. Webster and M. McElvy regarding case update and upcoming dates and deadlines; corresponded with Baker Botts team regarding updates to case calendar; reviewed correspondence from K. Hill (trustee counsel) and M. Stromberg regarding Rogers' intent to file motion to convert case to chapter 11; analyzed issues/research needed regarding same; corresponded with Baker Botts team regarding same and next steps; teleconferenced and corresponded with K. Jacobsen regarding legal research concerning case conversion issues and appointment of chapter 11 trustee; teleconference with K. Hill regarding conversion and other case issues.
04/26/22	K M Sherman		0.5	Reviewed and analyzed notice of hearing regarding motion for remand and updated associated deadlines; exchanged correspondence with D. Eastlake and K. Jacobsen regarding same; reviewed and analyzed order granting involuntary petition and corresponded with working group regarding same.
04/27/22	D R Eastlake		2.4	Corresponded with M. McElvy regarding next steps in case and trustee appointment issues; corresponded with K. Black regarding case calendaring updates; reviewed and analyzed memo prepared by K. Jacobsen regarding Mandarin's motion to remand, analysis of arguments raised therein, counter arguments and related issues and formal response to motion; reviewed and responded to correspondence from K. Hill (trustee counsel) regarding conversion issues and precedent against same; reviewed and analyzed objection precedent received from K. Hill; reviewed and analyzed conversion research findings sent by K. Jacobsen.
04/27/22	K M Jacobser	ı	3.1	Researched conversion to chapter 11.
04/27/22	K M Jacobser	ı	1.2	Researched regarding dischargeability.
04/27/22	K M Jacobser	ı	5.5	Reviewed and analyzed arguments in motion to remand, including research regarding same.

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BAKER BOTTS LLP

Invoice No:

Invoice Date: Matter:

50011088

May 13, 2022 088698.0102

Webster, Steven A.

<u>Date</u> 04/27/22	<u>Name</u> K M Sherman	<u>Hours</u> 0.8	Description Prepared correspondence to team regarding the motion for remand; reviewed and analyzed notice of chapter 7 bankruptcy for D. Rogers, executed order for relief and notice for motion for remand and updated all associated case deadlines for same; prepared further correspondence to team regarding same.
04/28/22	D R Eastlake	0.5	Reviewed and analyzed dischargeability legal research findings and analysis prepared by K. Jacobsen.
04/28/22	K M Jacobsen	2.3	Researched regarding dischargeability.
04/29/22	D R Eastlake	0.3	Teleconferenced with T. Dortch regarding Wildcat motion to lift stay and related issues and case status.
Matter Hours		67.4	Value of highlighted line-items = \$ 38,442.94
Matter Fees	\$	69,881.00	

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BAKER BOTTS LLP

Webster, Steven A. Dennis J. Rogers, II Bankruptcy Proceeding Invoice No: 50011088 Invoice Date: May 13, 2022 088698.0102 Matter:

2022 Lawyer Summary

<u>Timekeeper</u>	HOURS	RATE	AMOUNT
D R Eastlake	26.8	1,305.00	34,974.00
K M Jacobsen	30.4	860.00	26,144.00
K M McElvy	4.4	1,130.00	4,972.00
T J Sales	0.8	1,350.00	1,080.00
C E Tutunjian	1.7	860.00	1,462.00
	64.1		\$68,632.00

2022 Non-Lawyer Summary

<u>Timekeeper</u>	HOURS	RATE	AMOUNT
R M Fontenla	0.7	410.00	287.00
K M Sherman	2.6	370.00	962.00
	3.3		\$1,249.00

For Expenses Incurred:

Vendor: Business Card Invoice#: 050031242235 Date: 03/24/2022 - Business Card; Texas Court Fees	3.33
and Research Fees for March 2022	
Vendor: Business Card Invoice#: 050031245102 Date: 03/24/2022 - Business Card; Texas Court Fees	5.35
and Research Fees for March 2022	
Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for	3.99

Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Meals - Other DAVID EASTLAKE Water at IAH for David Eastlake on 3/27/2022 prior to flight to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.

Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Hotel - Lodging DAVID EASTLAKE Hotel stay for David Eastlake at Hall Arts Hotel in Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.

Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Airfare DAVID EASTLAKE Roundtrip United Airlines flight for David Eastlake to Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.

Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Taxi / Car Service DAVID EASTLAKE Lyft ride for David Eastlake to from Dallas airport to hotel in Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.

410.20

46.24

230.52

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BAKER BOTTS LLP

Invoice No: 50011088
Invoice Date: May 13, 2022
Matter: 088698.0102

Webster, Steven A.

Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Taxi / Car Service DAVID EASTLAKE Lyft ride for David Eastlake to from hotel to dinner in Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.	9.75
Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Taxi / Car Service DAVID EASTLAKE Lyft ride for David Eastlake from dinner back to hotel in Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.	11.03
Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Taxi / Car Service DAVID EASTLAKE Lyft ride for David Eastlake from Dallas office to airport in Dallas, Texas to attend Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.	68.80
Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Breakfast DAVID EASTLAKE Breakfast at Berkley's M.K.T. for David Eastlake on 3/28/2022 while attending Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.	7.58
Vendor: Eastlake, David R. Invoice#: 5100634704181524 Date: 4/18/2022 - Trip to Dallas for Emergency Hearing-3/27/22 - Trip to Dallas for Emergency Hearing-3/27/22 Parking DAVID EASTLAKE Parking at SP+ Global IMS for David Eastlake on 3/28/2022 while attending Emergency Hearing on Motion to Appoint an Interim Chapter 7 Trustee.	48.00
Online Legal Research: Courtlink	672.00
Online Legal Research: Courtlink	8.79
Online Legal Research: Lexis	680.50
Online Legal Research: Westlaw	882.18
Pacer Electronic Court Records	80.50
Total Expenses	\$3,168.76

Case 22-30500-swe7 Doc 250-4 Filed 08/14/24 Entered 08/14/24 23:37:17 Desc Exhibit D Page 43 of 43

BAKER BOTTS LLP

TAX ID 74-1195457

Austin Brussels Dallas Dubai **Houston** London Moscow New York Palo Alto Riyadh San Francisco Washington

Webster, Steven A. 2701 Kirby Dr Houston, TX 77098

Invoice Number:

50011088

Invoice Date:
Matter Number:

May 13, 2022 088698.0102

Due Upon Receipt

REMITTANCE STATEMENT

Matter Number:

088698.0102

Client:

Webster, Steven A.

Matter:

Dennis J. Rogers, II Bankruptcy Proceeding

Invoice Number:

50011088

Billing Attorney:

M D McElvy

Office:

Houston

Total Fees

\$69,881.00

Total Expenses

\$3,168.76

Total Invoice Amount

\$73,049.76

TO ENSURE PROPER APPLICATION OF YOUR PAYMENT PLEASE RETURN THIS REMITTANCE ADVICE OR EMAIL TO ARHOUSTON@BAKERBOTTS.COM

Please Remit to: Wiring Instructions

Baker Botts L.L.P.

Bank: JP Morgan Chase Bank

Address: 712 Main Street, Houston, TX 77002

ABA Number: 021 000 021 Swift Code: CHASUS33 Primary Account: 001 0000 2006 (Reference Invoice Number) ACH Information:

Baker Botts L.L.P.

Bank: JP Morgan Chase Bank

Address: 712 Main Street, Houston, TX 77002 Routing Number: 111 000 614

Primary Account: 001 0000 2006 (Reference Invoice Number)

To Pay by Check, send to: Baker Botts L.L.P. P.O. Box 301251 Dallas, TX 75303-1251 (Reference Invoice Number)